

### REMARKS

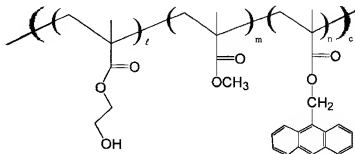
Applicants have amended claim 1 and added new claims 16-21 to more particularly point out and distinctly cover their invention. Support for the amendment to claim 1 can be found in the specification at page 8, line 7 through page 9, line 3 and also in original claim 1. Support for new claim 16 appears in the specification at page 5, line 18 through page 6, line 12 and page 9, lines 10-17 and also in original claims 1 and 5. The other new claims, i.e., claims 17, 18, 19, 20, and 21, are based on claims 2, 3, 7, 8, and 9, respectively. They differ from claims 2, 3, 7, 8, and 9 only in that they depend from claim 16, instead of claim 1. Moreover, Applicants have amended claim 5 to rectify a minor deficiency. Finally, the amendment to claim 1 has necessitated cancellation of claim 4.

Upon entry of the above amendments, claims 1-3 and 5-21 will be pending and under examination. Applicants respectfully request that the Examiner reconsider this application, as amended, in view of the following remarks.

### Rejection under 35 U.S.C. § 102

The Examiner rejects claims 1-3 and 6-11 as being anticipated by Baek et al., KR 2001-0018906 (Baek). Claim 1, the broadest claim, will be discussed first.

Claim 1, as amended, covers a composition containing a crosslinking agent, a light absorbing agent, a thermal acid generator, an organic solvent, and an adhesivity enhancer. The light absorbing agent is a unique polyester copolymer having Chemical Formula 3 shown below:

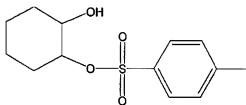


Baek discloses a polymeric composition useful for preventing diffuse reflection. The composition includes, among others, polyvinylphenol, which is a light absorbing agent. By contrast, the composition of claim 1 includes, as a light absorbing agent, a polyester copolymer of Chemical Formula 3. Structurally, polyvinylphenol is substantially different from polyester, let alone the unique polyester of Chemical Formula 3.<sup>1</sup> As correctly pointed out by the Examiner, “Baek does not teach [the] present light absorbing agent of Chemical Formula 3 [].” See the Office Action, page 3, lines 3-4. Thus, the composition of claim 1 is different from that disclosed in Baek. In other words, amended claim 1 is not anticipated by this reference.

By the same token, claim 7 is also not anticipated by Baek, as it covers use of the composition of claim 1. Neither are claims 2, 3, 5, and 6, dependent from claim 1, and claims 8-15, dependent from claim 7.

#### New claims

Among the new claims, claim 16 is the broadest. It covers a composition containing a crosslinking agent, a light absorbing agent, a thermal acid generator, an organic solvent, and an adhesivity enhancer. The thermal acid generator is a unique compound of Chemical Formula 4 shown below:



Baek discloses a polymeric composition useful for preventing diffuse reflection. See discussion above. As correctly pointed out by the Examiner, “Baek does not teach [the] present thermal acid generator of Chemical Formula 4.” See the Office Action, page 3, lines 3-4. Clearly, it does not anticipate claim 16, which requires this special thermal acid generator.

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<sup>1</sup> The polyester of Chemical Formula 3 is a copolymer containing 3 different ester repeating units.

For the same reasons, claim 19, which covers use of the composition of claim 16, is also not anticipated by Baek. Neither are claims 17 and 18, dependent from claim 16, and claims 20 and 21, dependent from claim 19.

#### Allowable Subject Matter

The Examiner acknowledges that original claims 4 and 5 cover allowable subject matter as the limitations recited therein are not disclosed in the prior art. On the other hand, he objects to both claims on the ground that they depend from a rejected base claim.

Applicants have incorporated the limitation of original claim 4 into original claim 1 and added new claim 16 to include all of the limitations of original claims 1 and 5. As such, current claims 1 and 16, reciting the limitations of allowable original claims 4 and 5, respectively, are also allowable for the same reasons set forth by the Examiner.

#### CONCLUSION

In view of the above remarks, Applicants submit that the rejection asserted by the Examiner has been overcome and claims 1-3 and 5-21, as pending, cover subject matter which is novel over the prior art. It is therefore requested that all of the pending claims be allowed.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Applicant(s) : Jae-Hyun Kim et al.  
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Client Ref. No.: OPP 050737 US

The excess claims fee in the amount of \$105 is being paid concurrently herewith on the Electronic Filing System (EFS) by way of Deposit Account authorization. Please apply any other charges or credits to Deposit Account No. 50-4189, referencing to Attorney's Docket No. 66302-006US1.

Respectfully submitted,

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